

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

LESTER LEE,

PLAINTIFF

v.

BROOKSIDE PARK CONDOMINIUM,
INC., METROPOLIS (aka MCM, INC.),
RAMMY AZOULAY AND LAMONT
SAVOY

DEFENDANTS

Case No. 8:24-cv-01205-TJS

**DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka
MCM, INC.), AND RAMMY AZOULAY'S OPPOSITION TO PLAINTIFF'S MOTION
TO STRIKE DEFENDANTS SECOND AND FOURTH AFFIRMATIVE DEFENSES TO
PLAINTIFF'S COMPLAINT**

COMES NOW, Defendants Brookside Park Condominium, Inc., Metropolis (aka MCM, Inc.), and Rammy Azoulay (Collectively "Brookside"), through their attorneys Anthony D. Dwyer and Eccleston and Wolf, P.C., respectfully submits the following Opposition to Plaintiff's Motion to Strike Defendants' Second and Fourth Affirmative Defenses to Plaintiff's Complaint. The Court should deny plaintiff's motion because (1) Brookside has provided Plaintiff with proper notice of their Second Affirmative Defense. This motion is disingenuous. The PG ordinance is cited in a letter attached to the complaint, The PG ordinance is cited in a letter attached to the complaint, which is Prince George's County Maryland, § 3-185.01 (1997), and (2) Brookside is entitled to medical information prior to granting an accommodation thus the motion to strike the Fourth Affirmative Defense Should be Denied. Alternatively, Brookside is entitled to a Motion For a More Definite Statement thus Plaintiff's request to strike The Fourth Affirmative Defense should

be denied. Also, it would be premature to strike any affirmative defenses. A Memorandum of Law is attached hereto and incorporated herein.

Respectfully submitted,

/s/Anthony D. Dwyer

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of July, 2024, copies of the foregoing **DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka MCM, INC.), AND RAMMY AZOULAY'S OPPOSITION TO PLAINTIFF'S MOTION TO STRIKE DEFENDANTS SECOND AND FOURTH AFFIRMATIVE DEFENSES TO PLAINTIFF'S COMPLAINT, MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka MCM, INC.), AND RAMMY AZOULAY'S OPPOSITION TO PLAINTIFF'S MOTION TO STRIKE DEFENDANTS SECOND AND FOURTH AFFIRMATIVE DEFENSES TO PLAINTIFF'S COMPLAINT, AND PROPOSED ORDER** were served by first-class mail, postage prepaid to:

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Pro Hac Vice

/s/Anthony D. Dwyer
Anthony D. Dwyer (415575)